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## Georgia Public Service Commission

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6-98

November 12, 1999

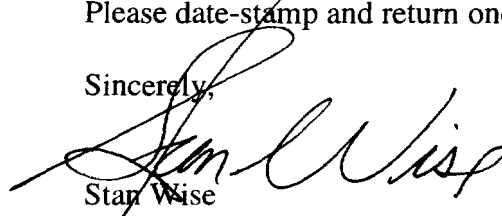
Ms. Magalie Roman Salas  
Commission Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

**Re: Petition of the Georgia Public Service Commission for Additional  
Delegated Authority to Implement Number Conservation Measures**

Dear Ms. Salas:

Enclosed please find one original and six copies of the Georgia Public Service Commission's Petition for Additional Delegated Authority to Implement Number Conservation Measures. Please date-stamp and return one copy in the enclosed self-addressed stamped envelope.

Sincerely,



Stan Wise  
Chairman, Georgia Public Service Commission

SW/js

Enclosures

No. of Copies rec'd  
List ABCDE

045

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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In the Matter of	)	
	)	
Petition for Declaratory Ruling and	)	
Request for Expedited Action on	)	NSD File No. L-97-42
July 15, 1997 Order of the Pennsylvania	)	
Public Utility Commission Regarding	)	
Area Codes 412, 610, 215 and 717	)	
	)	
	)	
Implementation of the Local Competition	)	
Provisions of the Telecommunications	)	CC Docket No. 96-98
Act of 1996	)	

**THE GEORGIA PUBLIC SERVICE COMMISSION'S PETITION  
FOR ADDITIONAL DELEGATED AUTHORITY  
TO IMPLEMENT NUMBER CONSERVATION MEASURES**

The Georgia Public Service Commission (GPSC), as part of its Docket No. 11297-U, submits to the Federal Communications Commission (FCC) this petition for additional delegated authority pertaining to number conservation measures. Pursuant to paragraphs 30 and 31 of the FCC's September 28, 1998 Memorandum Opinion and Order and Order on Reconsideration in NSD File No. L-97-42, the GPSC requests authority to implement various number conservation measures. The GPSC seeks authority to implement measures that will help ensure that number resources are made available in an efficient, equitable and timely basis to all carriers and slow the pace of area code relief, without having anticompetitive consequences or favoring one segment of the industry over another.

Specifically, the GPSC respectfully requests that the FCC grant it the authority to:

1. Institute thousand-block number pooling.
2. Order the return of unused and reserved NXX codes.<sup>1</sup>
3. Set NXX code allocation standards.
4. Require submission of utilization data.

## **I. BACKGROUND**

The GPSC has been investigating telephone numbering issues and area code relief since 1997, and has a history of sustained action on numbering issues. In particular, upon the receipt of notification in 1997 that the 770 area code was being placed in jeopardy status, the GPSC, following public hearings and a formal hearing, entered an Order implementing an all services overlay and adding a new area code, 678, to relieve both the 770 and 404 area codes. As a part of that Order, entered in Docket No. 7423-U, the GPSC directed that rate center consolidation be studied as a potential conservation measure relating to area code exhaust.

In addition, the GPSC was informed in 1998 by Lockheed Martin IMS, North American Numbering Plan Administrator ("NANPA") that based on then current demand projections, Georgia would exhaust the supply of Central Office codes in area code 912 by approximately the fourth quarter of 1999. Subsequently, the NANPA advised the GPSC that based upon a reduction in demand for central office codes, the supply of central office codes in area code 912 would not be exhausted until the third quarter of 2001. On September 21, 1999, following public hearings and a formal hearing, the GPSC issued an Order in Docket No. 9066-U approving an area code exhaust plan. The approved exhaust plan split the existing 912 area code geographic region into three separate sections, and assigned new area codes, 229 and 478, to two of those sections. The Order further provided that mandatory use of the two new area codes would begin on August 1, 2001.

Despite these efforts, numbering resource difficulties in Georgia continue to escalate. For example, the NANPA has advised the GPSC that based upon current demand projections, it is estimated that Georgia will exhaust the supply of central office codes in area code 678 by the first quarter of 2001.

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<sup>1</sup> NXX codes are exchange or central office prefixes-the first three digits of a standard seven-digit telephone number.

The GPSC needs the authority to confront these numbering resource difficulties in a timely manner. Such authority will allow the GPSC to protect the consumers of Georgia, as well as telecommunications companies, from the expense and confusion associated with repeated area code relief measures.

The GPSC recognizes that the FCC has issued a Notice of Proposed Rulemaking (NOPR) in the Matter of Numbering Resource Optimization (CC Docket No. 99-200). While the NOPR indicates the FCC's intent to address the issue of telephone number exhaust, and contains a number of potentially helpful approaches to this problem, the GPSC seeks additional authority at this time to implement various conservation measures pending the completion of Docket No. 99-200 in order to avoid the escalation of area code difficulties already being experienced in Georgia.

## **II. AUTHORITY REQUESTED**

The GPSC respectfully requests that the FCC grant it the authority to undertake all or some of a variety of number conservation measures. These measures will conserve numbers without anticompetitive consequences and without favoring one type of provider or technology over another. Specifically, the GPSC requests that the FCC grant it the authority to institute thousand-block number pooling, order the return of unused and reserved NXX codes, set NXX code allocation standards and require the submission of utilization data.

### **A. THOUSAND-BLOCK NUMBER POOLING**

The GPSC requests that the FCC grant it the authority to institute mandatory thousand-block number pooling. Number pooling is a valuable mechanism to alleviate the inefficient use of numbering resources. The GPSC is aware of the successful implementation of number pooling in the State of Illinois, and believes that number pooling could have similar benefits in Georgia. As development of mandatory national thousand-block pooling guidelines may take considerable time, the GPSC requests additional authority to implement its own thousand-block number pooling requirements in advance of any federal rules.

## **B. RECLAIM UNUSED AND RESERVED NXX CODES**

The GPSC requests that the FCC grant it the authority to reclaim unused and reserved NXX codes in Georgia. The reclamation of NXX codes that are not in use may serve to prolong the life of existing area codes in Georgia, and protect the consumers of telecommunications services in Georgia from the burden of continual introduction of new area codes. Therefore, the GPSC requests authority to investigate whether code holders have activated NXX codes assigned to them within the time frames specified in the CO Code Assignment Guidelines, and to direct the NANPA to reclaim NXX codes that the GPSC determines have not been activated in a timely manner. The GPSC further requests that the FCC direct the NANPA to abide by the GPSC's determination to reclaim an NXX code if the GPSC is satisfied that the code holder has not activated the code within the time specified by the CO Code Assignment Guidelines.

## **C. SET NXX CODE ALLOCATION STANDARDS**

The GPSC requests that the FCC grant it the authority to direct the NANPA to establish code allocation standards to manage numbering resources more efficiently. Specifically, the GPSC requests authority to require NXX code applicants to demonstrate that they have met certain fill rates prior to obtaining additional numbering resources, even in those NPAs that are not in jeopardy. The GPSC is aware that the FCC has granted similar authority to the Florida Public Service Commission, and recognizes that the FCC has expressed concerns about the potential competitive impact of imposing a fill-rate regime on carriers' ability to serve customers. If granted the authority to set NXX code allocation standards, the GPSC will comply with any guidelines established by the FCC in order to allay any concerns about possible competitive impacts, including consultation and coordination with other state commissions that may have obtained authority to impose fill rates.

## **D. REQUIRE THE SUBMISSION OF UTILIZATION DATA**

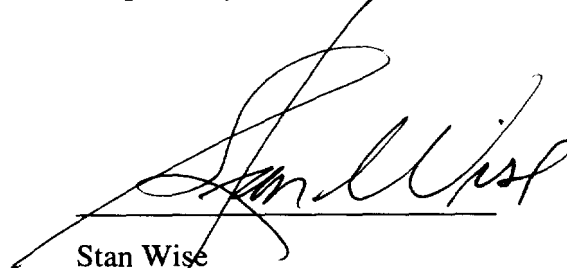
The GPSC requests that the FCC grant it the authority to obtain information from carriers in Georgia relating to those carriers' utilization of numbering resources. The authority to conduct number utilization surveys from all carriers is necessary to aid the GPSC in planning for area code relief and

thousand-block number pooling. While requesting the authority to require the submission of utilization data from carriers, the GPSC recognizes that any grant of authority from the FCC may be limited in duration until such time as the FCC enacts rules or policies relating to collection of data on carriers' use of numbering resources.

### **III. CONCLUSION**

The GPSC respectfully requests that the FCC grant this Petition for Additional Authority pertaining to number conservation measures so that the GPSC may ensure more efficient number utilization and protect the consumers of telecommunications services in Georgia from the expense and confusion of repeated area code relief measures.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stan Wise", is written over a horizontal line.

Stan Wise  
Chairman  
GEORGIA PUBLIC SERVICE COMMISSION  
47 Trinity Avenue, S.W.  
Atlanta, Georgia 30334